

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, Plaintiff, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge Alison Breaux
PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO DEFENDANTS' MOTION FOR DISCOVERY SANCTIONS	

Plaintiff Member Williams hereby moves for an extension of six (6) days, until next Wednesday, April 19, in which to file an opposition to Defendants' Motion for Discovery Sanctions filed on March 27, 2017. This opposition was originally due on April 6, 2017, and Defendants agreed to a one-week extension of this deadline on the record at the April 5, 2017 hearing. Plaintiff requests this further extension because her opposition to Defendants' motion will be based in large part on law and facts that will be submitted with her impending motion to lift the currently pending gag order that is due on April 19 per the Court's April 5, 2017 Order. Plaintiff's counsel has conferred with Defendants' counsel who has confirmed that Defendants do not oppose the requested six-day extension. This motion is not interposed for delay and will not unduly prejudice anyone. For these reasons, the Court should grant the requested extension.

Dated: April 13, 2017

Respectfully submitted,

THE CHANDRA LAW FIRM, LLC

/s/ Peter Pattakos

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CERTIFICATE OF SERVICE

The foregoing document was served on all necessary parties by operation of the Court's e-filing system on April 13, 2017.

/s/ Peter Pattakos

One of the Attorneys for Plaintiff